

**From:** [Tiffany Bolton](#)  
**To:** [DPTI:Planning Reform Submissions](#)  
**Subject:** My Feed back on the proposed changes to the Planning and Design code  
**Date:** Friday, 28 February 2020 3:28:47 PM

---

Thankyou for the opportunity to provide feedback on the proposed changes to the Planning and Design Code.

I wish to raise the following concerns in regard to the proposed revised Planning and Design code.

### **Comment on the process for community consultation**

I found it impossible to access the information needed in the documents on the DPTI website in order to properly comment on the proposed changes. I called to speak to a project officer on three occasions. When I finally did get to speak with a project officer he wanted to answer questions I was not asking. When I reiterated my questions, he said he was not equipped to answer those questions, and recommended I submit my question in writing on the website, and someone would follow up with me. I did this as requested, but have not received any response within the time frame of being able to comment on the proposed changes. Such basic inadequacy of process must demonstrate the invalidity of the community consultation. One has to ask how many people were put off from providing feedback for similar reasons ie they couldn't access the material in order to understand and comment on it.

### **Water Sensitive SA community consultation**

I attended the Water Sensitive SA community consultation meeting in Woodville on 4 February, and this meeting shed some light on what the new code will allow.

It appears from examples discussed at that meeting of what will meet the new code that developers would be able continue to make very tight divisions eg 18 residences on what was once 2 blocks for single accommodation ( houses with a large garden).

In one design which was said to meet the new code, an increase in soft landscaping area from about 8 % presently to around 15 % is seen as being 'green' and enhancing adaptation to climate warming, human amenable temperature and water recycling. It should be obvious that such small amendments are inadequate in addressing these concerns.

It appears as if developers want to maintain the current situation where they can make huge amounts of money through taking some financial risk, and carving up a large block in this way.

(See for example : Michael Yardney ' How To grow a Multi- million Dollar Property Portfolio - in Your Spare time . 3rd edition 2009 )

Their interest is not the public's interest.

We are in a climate crisis as witnessed by the recent unprecedented bushfires, and scientists are predicting the situation will continue to become more extreme. We will

have to deal with warmer summers, not even the current situation which is difficult enough.

This is an opportunity when planning is being reviewed, to throw out the old dysfunctional rules that greatly skew towards the 'needs' of developers, and take some of the radical steps that are called for to address the climate and environmental crisis we are moving into, willy nilly. I believe it should be clear that small incremental changes will not cut it.

### **Problems that appear with this approach;**

**Biodiversity** is in crisis and declining. Adding a strip of 50 cm wide soft landscaping in a development will achieve virtually nothing towards providing a green space suitable for supporting biodiversity. There also needs to be a description/ prescription for what "soft landscaping" should include and what is unacceptable. We need increased grass, shrubs and other vegetation in these spaces compared with 'business as usual'. Consultation with biologists who understand what types of plants are needed to support biodiversity should be included as a requirement.

**Ameliorating heat effects of denser development** should be given a much higher profile.

This policy will not contribute to the 20% increase in green cover target in the 30 Year Plan, given on most sites there is a net loss of green cover.

Studies by Adapt West show closely developed new areas like Light's View have a much greater heat profile than those older areas with larger gardens. It is hard to avoid the conclusion that the new code will allow the heat impacts of denser development to compound with those we know are coming, and are already here from climate heating.

This will have impacts on community health, particularly for the young, the elderly and those in frail health.

For too long developers have been able to make large profits from subdividing a large block and placing many dwellings in the same space, without due regard for the optimum amenity or wellbeing for those who will live there. For the good of our community, even for survival in a changing climate, this mentality has to go. We now have better information about what built environments support healthy sustainable communities, and this information should inform the code, rather than going for small tweaks to what is really an inadequate current practice. If not now, when? Do we want to allow costly developments that will have to be undone in the future because they don't meet the needs of that time?

At the community consultation meeting some alternative models were presented. I am not sure how well these have been researched in terms of meeting the requirements for adapting to changing climate, and contributing to long term environmental sustainability. Obviously our understanding in these areas continues to evolve. It seems self evident

however that at whatever point in time , the responsible approach is to incorporate what is known best practice at that time into the code.

I am curious to know what is the research base that supports the current changes to the code. As I said above, it was impossible to come close to getting an answer to this from contacting a project officer as suggested on the DPTI website.

### **Lack of shared outdoor space-**

There are mental health implications of social isolation. When built environments encourage people to exit their car, walk in their door and they don't have the opportunity to meet on neutral ground and get to know their neighbours, this leads to social isolation. If there is to be denser development, there is a need to make opportunities and spaces for shared engagement, as desired. Shared outdoor space allows for this. Developers should be asked to factor these costs into the design and build, rather than passing this on to the tax payer or local councils.

( It is documented that in low income households especially, but for all except perhaps the very rich who have the means to pay for whatever human services they feel they need, good mental health goes with a sense of community. Failure in this area leads to bad mental health outcomes, depression, adolescent lack of social integration, suicide risk etc. The publicly funded mental health systems bear the cost, and the effects can be felt intergenerationally. )

### **Inadequate allowance for private outdoor space**

As well as this individually accessible outdoor space is important for those who choose this. A model that requires or encourages developers to consult with potential consumers, rather than presenting a preconceived limited array of options as a fait accompli, would contribute to better outcomes in terms of community well being.

The limited thinking of developers eg how many residences can I squeeze on this property to maximise my profits should not be the touchstone here , and we have a chance to change this now.

Minimal standards will not achieve this, as developers do not have the mindset of creating good communities. There is no reason to trust that they have the community's interests at heart, and not their own profit.

In summary I have reviewed the recommendations from the Water Sensitive SA community consultation, and I strongly endorse the community opinion that is reflected there. I believe the community has not had adequate opportunity to be informed on the implications of the new code, nor has it been made clear on what evidence base the code has been developed.

Sincerely

Tiffany Bolton (B.Sc.(Hons) B.Soc.Admin.)



Croydon 5008